

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

<u>Isaiah Paige</u>)	
_____)	
_____)	
_____)	
Plaintiff(s),)	
)	
vs.)	Case No.
<u>City of Chicago</u>)	
_____)	
_____)	1:25-cv-02568
)	Judge Georgia N Alexakis
)	Magistrate Judge Young B. Kim
Defendant(s).)	RANDOM / CAT.2

COMPLAINT FOR VIOLATION OF CONSTITUTIONAL RIGHTS

This form complaint is designed to help you, as a pro se plaintiff, state your case in a clear manner. Please read the directions and the numbered paragraphs carefully. Some paragraphs may not apply to you. You may cross out paragraphs that do not apply to you. All references to "plaintiff" and "defendant" are stated in the singular but will apply to more than one plaintiff or defendant if that is the nature of the case.

1. This is a claim for violation of plaintiff's civil rights as protected by the Constitution and laws of the United States under 42 U.S.C. §§ 1983, 1985, and 1986.
2. The court has jurisdiction under 28 U.S.C. §§ 1343 and 1367.
3. Plaintiff's full name is Isaiah Pierre Paige.

If there are additional plaintiffs, fill in the above information as to the first-named plaintiff and complete the information for each additional plaintiff on an extra sheet.

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4. Defendant, City of Chicago, is
(name, badge number if known)
- ☐ an officer or official employed by _____;
(department or agency of government)
- _____ or
- ☒ an individual not employed by a governmental entity.

If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.

5. The municipality, township or county under whose authority defendant officer or official acted is Cook County. As to plaintiff's federal constitutional claims, the municipality, township or county is a defendant only if custom or policy allegations are made at paragraph 7 below.

6. On or about 08/01/2023, at approximately 12:00 ☐ a.m. ☒ p.m.
(month, day, year)
- plaintiff was present in the municipality (or unincorporated area) of _____
Chicago, in the County of Cook,
State of Illinois, at 6450 S. Seeley ave, Chicago, IL 60636,
(identify location as precisely as possible)

when defendant violated plaintiff's civil rights as follows (***Place X in each box that applies***):

- ☒ arrested or seized plaintiff without probable cause to believe that plaintiff had committed, was committing or was about to commit a crime;
- ☒ searched plaintiff or his property without a warrant and without reasonable cause;
- ☒ used excessive force upon plaintiff;
- ☒ failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;
- ☒ failed to provide plaintiff with needed medical care;
- ☒ conspired together to violate one or more of plaintiff's civil rights;
- ☒ Other:

Due Process Clause of the Fourteenth Amendment, Chicago police failure to

prevent harm from occurring while having a reasonable opportunity.

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7. Defendant officer or official acted pursuant to a custom or policy of defendant municipality, county or township, which custom or policy is the following: (*Leave blank if no custom or policy is alleged*): 50 ILCS 705/6.3- "Duty to Intervene"

8. Plaintiff was charged with one or more crimes, specifically:

n/a

9. (*Place an X in the box that applies. If none applies, you may describe the criminal proceedings under "Other"*) The criminal proceedings

☐ are still pending.

☐ were terminated in favor of plaintiff in a manner indicating plaintiff was innocent.¹

☐ Plaintiff was found guilty of one or more charges because defendant deprived me of a fair trial as follows n/a

☐ Other: n/a

¹Examples of termination in favor of the plaintiff in a manner indicating plaintiff was innocent may include a judgment of not guilty, reversal of a conviction on direct appeal, expungement of the conviction, a voluntary dismissal (SOL) by the prosecutor, or a *nolle prosequi* order.

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10. Plaintiff further alleges as follows: *(Describe what happened that you believe supports your claims. To the extent possible, be specific as to your own actions and the actions of each defendant.)*

Chicago Police Department has appx from 2020 through 2025 allowed and encouraged my civil, state and federal rights to be violated by third part persons as well as their own police department. The City of Chicago Police department has furthermore failed to respond and act in multiple violations of city and state laws which have put my life in jeopardy, as well as my health, safety and well being. Chicago police have illegally searched my vehicle and taken items from my vehicle and have allowed damages to occur to my home property and person. City of Chicago Finance Department has deprived me of funds paid on parking tickets that I did not owe and failed to allow me to resolve tickets without excessive fees and penalties and purposely failed to provide proper notices in such matters sending mail in the wrong full legal name to my address. Chicago Department of Buildings has continuously allowed property owners to violate my civil rights by closing out several requests for code enforcement violations without any explanation or follow up causing undue proximate causes \$10,000,000.00 damages claimed related to the trauma and experiences through all the above listed departments through City of Chicago which most have gone years still without formal investigation.

11. Defendant acted knowingly, intentionally, willfully and maliciously.

12. As a result of defendant's conduct, plaintiff was injured as follows:

A traumatic steady decline in my health and loss of income for appx 5 years as well as severe mental and health conditions threatening my life, livelihood, health and safety. Irreparably causing such a severe disparate impact that I have lost tens of thousands of dollars trying to cope with the effects of the severe trauma caused by the conduct and disregard from City of Chicago's employees and listed departments.

13. Plaintiff asks that the case be tried by a jury. ☒ Yes ☐ No

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14. Plaintiff also claims violation of rights that may be protected by the laws of Illinois, such as false arrest, assault, battery, false imprisonment, malicious prosecution, conspiracy, and/or any other claim that may be supported by the allegations of this complaint.

WHEREFORE, plaintiff asks for the following relief:

- A. Damages to compensate for all bodily harm, emotional harm, pain and suffering, loss of income, loss of enjoyment of life, property damage and any other injuries inflicted by defendant;
- B. ☒ (Place X in box if you are seeking punitive damages.) Punitive damages against the individual defendant; and
- C. Such injunctive, declaratory, or other relief as may be appropriate, including attorney's fees and reasonable expenses as authorized by 42 U.S.C. § 1988.

Plaintiff's signature: _____

Plaintiff's name (print clearly or type): _____

Isaiah Paige

Plaintiff's mailing address: _____

6450 S. Seeley Ave

City _____

Chicago

State _____

IL

ZIP _____

60636

Plaintiff's telephone number: () _____.

Plaintiff's email address (if you prefer to be contacted by email): _____

isaiahwalker@gmail.com

15. Plaintiff has previously filed a case in this district. ☒ Yes ☐ No

If yes, please list the cases below.

Paige vs. Nima Investments LLC, Chicago Housing Authority, Maguie Theophile, Mildred Okwuedei

Any additional plaintiffs must sign the complaint and provide the same information as the first plaintiff. An additional signature page may be added.